

MB Docket

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Federal Communications Commission
Office of the Secretary

The Hon. Kathleen Q. Abernathy,
Commissioner
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Dear Commissioner Abernathy:

The public hearing you and colleagues conducted in Monterey, California, on July 22nd was a commendable act of public service and a noteworthy expression of the democratic process on the most fundamental level.

I heartily support the consensus position of the commissioners present; that is, the loosening of rules governing ownership in a given market by a single entity (as recently advanced by the FCC and refuted by Congress and the courts) is a very bad idea. There already has been far too much consolidation in the media, and I would strongly advocate far *stricter* licensing and ownership standards than has been the case, even prior to the attempted rules changes advocated by Chairman Powell.

While I know I'm preaching to the choir, it must be said repeatedly and loudly that the trend toward ever-greater consolidation inevitably leads to more automated programming originating at centralized sources, which, in turn, results in further erosion of localized programming devoted to the public interest.

Speaking of the public interest, I want to raise a fairly radical question. It is universally acknowledged that the public owns the electromagnetic spectrum available for broadcast purposes. Yet, we grant individuals and corporations *licenses for unrestricted private profit through their use of a publicly owned resource*. Is this not fundamentally unjustified and unfair? Shouldn't the licensees have to pay for their privileged access to the national airwaves? After all, ranchers (to give but one example) are required to pay the government for grazing rights on Federal lands—admittedly a scandalously small fee, but the principal is sound. Why should broadcasters enjoy unlimited access to public property without cost?

I'm aware that the original enabling legislation tried to address this issue by requiring the licensees to act in the public interest. This condition was once spelled out in some detail, but modifications under political pressure over the years has weakened the provision to the point where "the public interest" is largely whatever the individual broadcaster says it is. Clearly, this state of affairs is unsatisfactory and contrary to the spirit and intent of the Communications Act of 1934.

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It is high time that the FCC acted responsibly to impose a much greater degree of public accountability on those who are given the right to utilize the broadcast spectrum.

Increased localism, as sought by the Task Force, is certainly one way to increase such accountability. It is, however, only part of the picture. The lack of adequate regard for the public interest on the part of the national networks is another area that must be addressed.

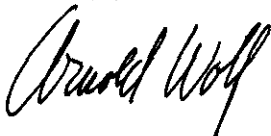
The need for such action was dramatically emphasized by the research study done at University of Southern California by Prof. Martin Kaplan and summarized at the Monterey meeting by Dean Joe Saltzman of the USC Annenberg School for Communication. I think it is fair to say that the audience, and perhaps even those Commissioners who may not have heard the material previously, were genuinely taken aback by the figures presented by Prof. Kaplan.

I'm sure that your series of public meetings has given you a wealth of information regarding the abdication of community responsibility on the part of broadcasters. At the very least, the FCC needs to define more clearly the minimum public interest obligations that radio and television media owners must meet. Equally important, a more effective mechanism has to be established for accurately and regularly reporting each outlet's degree of compliance, with unequivocal implications for license renewal.

While I understand that the question I've posed regarding payment by the media in return for their licensing privilege is politically explosive and beyond the Commission's current agenda, I would be most grateful to learn whether you support this proposition, at least in principle if not advocacy.

Thank you again for holding the Localism Task Force meetings and for your clear and persuasive presentation.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Arnold Wolf". The signature is fluid and cursive, with the first name "Arnold" being more prominent than the last name "Wolf".

Arnold Wolf

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